

**EXHIBIT 7**

**FILED UNDER SEAL**

RAMESH PANDEY - 11/13/2018

10 Transcript of the videotape deposition of  
11 RAMESH PANDEY, called for Oral Examination in the  
12 above-captioned matter, said deposition taken by and  
13 before SILVIA P. WAGE, a Certified Shorthand  
14 Reporter, Certified Realtime Reporter, Registered  
15 Professional Reporter, and Notary Public for the  
16 States of New Jersey, New York and Pennsylvania, at  
17 REGUS, 55 Madison Avenue, Fourth Floor, Morristown,  
18 New Jersey, on Tuesday, November 13, 2018,  
19 commencing at 9:08 a.m.

20

21

22

23

34

25 TOB NO MP-192938

RAMESH PANDEY - 11/13/2018

Pages 78..81

Page 78		Page 80
1	(Deposition Exhibit 148, replacing prior Exhibit 148, 2/2/16 e-mail from Henry Mirolyuz to Thomas Benku and Miranda Chiang and attachment FED000588_0001 to marked Confidential, was marked for identification.)	1 Q. So it's installed and it's run and part and parcel of running the software is that the software on that server goes to random access memory?
2		2 A. Yeah, it's part of same computer.
3		3 It's like cube, so you have random access at the top one, which is the fastest one. Next is slowest one.
4		4 Then you have a disk and then you have external disk, right. The more further you go -- and then
5		5 you have tape, slowest you are. Random access means
6		6 it's in memory.
7	(There is a discussion off the record.)	7 Q. Okay, alright. And then when the application is no longer running and it's no longer being used --
8		8 A. Then it will take up from there. Or if you have more application running, then it also takes off in two way.
9	Q. Let me change topics a bit.	9 Q. I need to -- could you give me that answer more slowly so I can understand.
10	A. Okay.	10 A. Okay, okay, I like that, actually.
11	Q. Just some really general questions.	11 Q. So, when it -- when the application is no longer running, the random access -- the copy of the software in random access memory is?
12	I think they're general questions. You're the technology person. Maybe it's a little Dick and Jane, but I need to go through this.	12 A. Go to the secondary, third, that way.
13		13 Q. Okay. And then disappears, right?
14		
15	So Blaze Advisor is a software product, right?	
16	A. Uh-huh.	
17	Q. And as a software product, Blaze Advisor is loaded on servers and, I believe, they're in Raleigh, North Carolina?	
18	A. Yes, that's our data center.	
19	Q. That's your data center, okay.	
20	And a server is another name for a group of computers?	
21	A. A big computer.	
22		
23		
24		
25		
Page 79		Page 81
1	Q. Big computer, alright.	1 A. No, no. It will go in slowly. So
2	A. Big laptop.	2 it's like Word document you have on folder, right.
3	Q. So Blaze Advisor is installed at the data center in Raleigh, North Carolina?	3 When you click it, it goes in memory. You can see
4		4 it, you can page it. But when you close it, it
5	A. Yes.	5 doesn't go away right away.
6	Q. Do you know whose data center that is today?	6 Q. Then it what?
7	A. That's new Chubb data center now.	7 A. It doesn't go away from the memory.
8	Q. Okay.	8 Q. Okay.
9	A. Yes.	9 A. Because if you double click again, it
10	Q. Do you know the corporate entity, the subpart of the big Chubb that, actually, owns that data center?	10 opens fast. It's already in memory.
11	MR. FLEMING: Objection, foundation.	11 Q. Okay.
12	Q. If you don't know, just tell me.	12 A. You leave it for some time, let's
13	A. (No response.)	13 say, 10 minute, 15 minutes, then it will take from
14	Q. Okay. Alright. So we have the Blaze Advisor software and it's installed on the servers.	14 memory and put on secondary slower part of it. But
15	Then when an application that utilizes Blaze Advisor software is run by someone,	15 if you open, let's say, hundred sub-document,
16	is a copy then of the Blaze Advisor software, does that go to random access memory?	16 hundred subject for feed, computer have limited
17	A. On that server.	17 memory, right. It decides which one will stay in
18	Q. On that server?	18 the memory, which one will not. Then if you open
19	A. Yeah.	19 it, it will take you also -- you'll think, okay,
20		20 might not work because slow, because I will open 20
21		21 other things. It's slow because it's just moved to
22		22 slower part of memory.
23		23 Q. And, in theory, at some point it
24		24 could just be removed from -- be deleted from
25		25 memory?

RAMESH PANDEY - 11/13/2018

Pages 82..85

Page 82		Page 84	
1	A. No, you cannot delete from memory.	1	A. That -- I know my paycheck. I don't
2	Q. Oh --	2	know about their paycheck.
3	A. You can put on the slower part of it,	3	Q. Okay. Do you know how many
4	like disk --	4	subsidiaries of -- how many subsidiary companies
5	Q. Okay.	5	within new Chubb benefit from Blaze Advisor and
6	A. -- floppy or whatever.	6	these named applications that use Blaze Advisor?
7	Q. Alright.	7	MR. FLEMING: Objection, lack of
8	A. It does it by itself.	8	foundation.
9	Q. Okay, thank you. Alright.	9	Q. Do you know?
10	So let me speak to the time period	10	A. If I have to guess, that I will say
11	after the merger now.	11	only Federal.
12	A. Okay.	12	Q. But you don't know that?
13	Q. And for the applications that use	13	A. (No response.)
14	Blaze Advisor software, is it Ace American Insurance	14	(There is a discussion off the
15	employees who maintain those applications, maintain	15	record.)
16	the data center like you are responsible for those	16	A. I was just guessing it. But if I had
17	applications continuing to function?	17	to guess, it's only Federal Insurance Company.
18	A. So let me ask clarifying question	18	Q. But then I said, so you don't know
19	just to make certain. When you say employee of Ace,	19	one way or the other?
20	we all became Ace employee.	20	A. Well, not hundred percent.
21	Q. You're all Ace employees?	21	(Deposition Exhibit 149, slide dec
22	A. So it would be Chubb and Ace, after	22	titled, "Specialty Lines System
23	merger we are new Chubb, actually. On paper we are	23	Integration Roadmap Day 1 to 5 year -
24	Ace, right. We get the paper check says Ace but	24	Proposal" September 2015 Draft
25	it's Chubb.	25	FED009664_001 to marked Confidential -
Page 83		Page 85	
1	Q. I understand.	1	Attorneys' Eyes Only, was marked for
2	A. So...	2	identification.)
3	Q. But I'm asking about the specific	3	Q. I've given you a document that we've
4	entity called Ace American Insurance Company that is	4	marked -- the Court Reporter has marked as
5	your employer.	5	Exhibit 149. As you see it's called, "Specialty
6	A. Uh-huh. So let me tell you and	6	Lines System Integration Roadmap," dated
7	correct me if I'm wrong. From my mind, Chubb	7	September 2015. It's a "draft."
8	employee, like me and Henry, we used to be part of	8	If you'd familiarize yourself with
9	Chubb, new Chubb, we get paid from Ace, but we're	9	it, please. I'll have a few questions.
10	still Chubb. We support their software because we	10	A. Okay.
11	are only ones who know that software. The guys who	11	Q. Have you seen this document before?
12	came from Ace, they don't have a clue about the	12	A. Yeah, we were working on it. This is
13	software. They don't know how to do it. We know	13	a draft copy, yeah.
14	that.	14	Q. And this is something that you were
15	Q. To your knowledge, are all of the	15	working on yourself?
16	employees who support the software that uses Blaze	16	A. My team.
17	Advisor, the applications that use Blaze Advisor,	17	Q. Yes.
18	all of the employees who support that, are they all	18	A. I was one of the reviewer of it.
19	Ace American Insurance Company employees?	19	Q. You were on the team?
20	A. Yes. They are Chubb and some --	20	A. I reviewer. I used to review it.
21	Q. New Chubb?	21	Q. Okay. And by "reviewer," does mean
22	A. New Chubb, yeah. Let's call it new	22	that you were the responsible one for the team, the
23	Chubb.	23	lead of the team?
24	Q. The new Chubb and their paychecks	24	A. No, no, somebody else was overall.
25	come from Ace American Insurance Company?	25	The responsible guy, CIO, Chief Information Officer.